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June 14, 2017

**Via ECF Filing**

The Honorable Michael E. Wiles  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green, 6th Floor  
New York, New York 10004-1408

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**Re: *In re Blue Dog at 399 Inc.*, No. 15-10694 (MEW)**

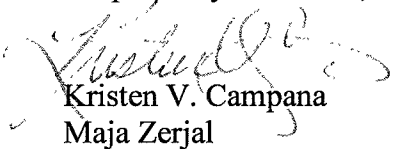
Dear Judge Wiles:

We are counsel to D&D Funding II, LLC, which holds the largest unsecured claim against Blue Dog at 399 Inc. (the “Debtor”).<sup>1</sup> We reviewed the pleadings filed by Seyfarth Shaw LLP (“Seyfarth”) on June 8, 2017 [ECF Nos. 98, 99, and 100] (collectively, the “Seyfarth Pleadings”). The Seyfarth Pleadings seek—on a shortened notice—approval of a purported settlement, which would impose on the Debtor the responsibility for Seyfarth’s fees and expenses as an administrative expense, even though the order originally approving Seyfarth’s retention made clear that the Debtor would have no responsibility for the payment of the services Seyfarth rendered to the Debtor.<sup>2</sup>

In its motion to shorten notice, Seyfarth requested a hearing on June 16, 2017, but did not provide a proposed objection deadline [ECF No. 98-1]. The United States Trustee and the Debtor promptly filed letter objections to the Seyfarth Pleadings [ECF Nos. 101 and 102, respectively], requesting, among other things, sufficient time to fully analyze such pleadings.

While the Court has not approved Seyfarth’s motion to shorten notice, D&D Funding II, LLC respectfully requests that the Court set an objection deadline and hearing date that give parties in interest sufficient time to review, analyze, and respond to the Seyfarth Pleadings—especially given the onerous burden they seek to impose on the Debtor’s estate and its creditors.

Respectfully submitted,

  
Kristen V. Campana  
Maja Zerjal

<sup>1</sup> See *Amended List of Creditors Holding 20 Largest Unsecured Claims*, dated April 16, 2015 [ECF No. 10].

<sup>2</sup> The order granting the application to employ Seyfarth as the Debtor’s special litigation counsel provided that the Debtor’s principal, Elizabeth Slavutsky, would advance and pay all fees and costs to compensate Seyfarth [ECF No. 67].